

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the matter of	)	ET Docket No. 01-278
Review of Part 15 and other Parts of the	)	RM-9375
Commission's Rules	)	RM-10051
	)	
	)	
Amendment of Parts 2 and 15 of the	)	ET Docket No. 95-19
Commission's Rules to Deregulate the	)	
Equipment Authorization Requirements	)	
For Digital Devices	)	
	)	

**MOTION FOR PARTIAL RECONSIDERATION BY CISCO SYSTEMS, INC.**

Cisco Systems, Inc., ("Cisco") hereby submits a request for reconsideration and clarification of certain aspects of Section 7 of the above Report and Order. Cisco fully supports the spirit of the actions taken by the Commission in the above referenced Report and Order. However, Cisco believes that the FCC could extend the action to include the Declaration of Conformity as required under Part 2.1072 to be included as one of the documents allowed to be provided to the end user via the internet

Cisco Systems Inc is the leading manufacturer of networking equipment, such as routers, and switches, optical systems, firewalls and other security products,, VoIP, storage networking. Cisco also is a leading manufacturer of enterprise wireless systems that connect systems and users to the Internet via wireless connections.

Cisco fully supports the Commission's continued efforts to revise its Part 15 rules to keep pace with technological and marketplace changes. One of the key changes has been a move by the Commission to provide the regulatory information electronically to the end user. However, in the past this electronic format has been limited to providing

the information either by CD or disk with the product. Distribution of this information exclusively by the Internet or and a web site only has previously not been permitted. The recent action authorized by the above docket allows this information to now be provided via the Internet.

However, the adopted regulation under Section 7 of the above Report and Order to include the warning statements and other regulatory information under Part 15 indicates that distributing information via the Internet does not apply to Part 2.1077, the Declarations of Conformity. The omission of Part 2.1077 from same treatment as other information though minor was not recognized by the industry as well during the filing of comments during the FCC Proceeding. In reviewing the requirements and comparing the various types of information, Cisco cannot identify any good reason why this document should not also be included in among the documents allowed that can be provided to the end user by the manufacturer over the Internet. Under the current regulations, the manufacturer who provides his information to the end user over the Internet must still supply a hard copy of the DofC to the end user either by hardcopy, disk, or CD. The manufacturer and ultimately the consumer will bear this cost with no clear regulatory benefit to anyone.

As per Part 15.19, the products are required to be labeled as proof of compliance and therefore the elimination of including the DofC in the package to the end user as a separate document would not effect the compliance of the device or the proof of compliance of the device. For systems being sold with documentation only available via

the internet the end user would have the same access to obtaining the DofC as they would the other regulatory information

Even before the release of the above Report and Order when the above described omission was identified, Cisco has filed with the Commission a request for a waiver with the Commission which would allow us to provide the Declaration of Conformity via the Internet before the release of the above Report and Order. After further consideration and discussion with others, Cisco now makes this Request for Reconsideration. As a consequence, if the reconsideration is granted, Cisco request that the request for waiver on this subject should be withdrawn in lieu of this action here as well

Therefore, Cisco urges the Commission to reconsider its decision on the above referenced Report and Order and to clarify the regulation to include the Declaration of Conformity in the information that is allowed to be provided electronically over the Internet.

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